

JAP:CHB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12- 055

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 963)

JARED K. SINGH,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER McKELVY, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between January 16, 2012 and January 17, 2012, within the Eastern District of New York and elsewhere, defendant JARED K. SINGH did knowingly, intentionally and unlawfully conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Section 963).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about January 16, 2012, an individual (hereinafter CO-CONSPIRATOR #1) arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, from Trinidad. CO-CONSPIRATOR #1 arrived aboard Caribbean Airlines Flight 520 from Port of Spain, Trinidad.

2. CO-CONSPIRATOR #1 was traveling with another individual (the "Friend").

3. The Friend was selected for a Customs and Border Protection ("CBP") examination. The Friend presented checked-in luggage for inspection. The CBP officer discovered six packages of powdered milk. The white powdery substance inside six packages was field tested and the substance in two of the six packages field tested positive for cocaine.

4. The total approximate gross weight of the cocaine found in the Friend's bag is 1,984.0 grams.

5. The luggage containing the cocaine was a small red suitcase. Written on the outside of the luggage in marker was "J + P SINGH."

6. On or about January 17, 2012, the defendant JARED

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.


P. SINGH arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, from Trinidad. SINGH arrived aboard Caribbean Airlines Flight 524 from Port of Spain, Trinidad.

7. SINGH was selected for a Customs and Border Protection ("CBP") examination. SINGH presented a large red suitcase for inspection. Written on the outside of the luggage in marker was "J + P SINGH." The suitcase appeared to be similar to the suitcase associated with CO-CONSPIRATOR #1 referenced above.

8. SINGH was placed under arrest and read his Miranda rights. SINGH appeared to understand and waived those rights.

9. SINGH admitted, in sum and substance and in part, that he was aware that CO-CONSPIRATOR #1 was carrying cocaine into the United States and that he had provided CO-CONSPIRATOR #1 with the suitcase that she used to import the cocaine into the country. He further stated that he was going to pay an amount of money to CO-CONSPIRATOR #1 in exchange for her importation of the cocaine into the country.

WHEREFORE, your deponent respectfully requests that
defendant JARED P. SINGH be dealt with according to law.


CHRIS MCKELVY
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
18th day of January, 2012

THE HONORABLE CHERYL L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK